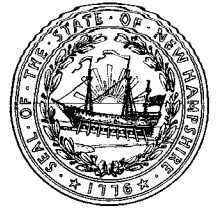




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

LETTER OF DEFICIENCY
WD WWEB/C 06-02

February 28, 2006

Lorna Aldrich
Town Administrator
Town of Northumberland
3 State Street
Groveton, New Hampshire 03582

Subject: National Pollutant Discharge Elimination System (NPDES) Compliance
Inspection at Groveton Wastewater Treatment Facility, Northumberland, NH -
NPDES Permit # NH0100226

Dear Ms. Aldrich:

On February 7, 2006, as a representative of the Department of Environmental Services (DES) Wastewater Engineering Bureau, I conducted an NPDES Compliance Sampling Inspection (CSI) at Groveton Wastewater Treatment Facility (Groveton). Objectives of a CSI included determining compliance with NPDES permit conditions, verifying the accuracy of permit-required information and verifying the adequacy of permittee sampling and monitoring.

The following people were present during this CSI:

Richard Marshall, Chief Operator, Groveton
Travis Wentworth, Operator, Groveton
Roy D. Gilbreth, Environmental Inspector, DES

DEFICIENCIES: (response required)

During the inspection I noted the following deficiencies:

1. A comparison of Monthly Operating Reports (MOR) and bench sheets revealed the July and August 2005 MORs contained some incorrect entries for total residual chlorine and pH. To ensure the data reported on MORs is correct, all entries need to be rechecked before submittal to DES and EPA. Pursuant to Part II, Section C. 1. c. of your NPDES permit, this information must be correct.
2. For the past six months, the pH electrode storage liquid has not been changed. In accordance with manufacturer's recommendations (see page 35 of your

electrode manual), the pH electrode must be stored in Hach electrode storage solution, and the storage solution must be replaced at least once a month.

3. According to your pH electrode manual (see page 10), the electrode must be primed daily by pumping Potassium Chloride Electrolyte Gel into the electrode. Since being placed in service six months ago, priming of the electrode has not been done. The electrode must be primed daily by pumping Potassium Chloride Electrolyte Gel into the electrode.
4. The total coliform alternative enrichment technique test method on your contract laboratory bench sheet is incorrect. The test method for total coliform using the alternative enrichment technique for Standard Methods 20th Edition is 9222(B+B.5d), not 9222(B+B.5c). The contract laboratory total coliform bench sheets must be corrected to reflect the correct test method.

REPEAT DEFICIENCIES (Noted in May 19, 2005 NPDES inspection – response required) If these repeat deficiencies are noted in any subsequent inspection then DES may proceed immediately with formal enforcement action which may include an administrative fine.

1. Presently, the pH meter is calibrated with pH buffers 8 and 10, and checked with a buffer 7 standard. The pH meter must be calibrated with pH buffers 7 and 10, and checked with a buffer 8 standard. This procedure must also be noted in your laboratory Quality Assurance Manual (QAM).

RECOMMENDATIONS/OBSERVATIONS: (No response required)

1. Food is stored in the laboratory refrigerator. Storing food here may present a health hazard for employees.
2. DES recommends that Groveton date all reagents with the date received and date opened. This will make inventory tracking easier and prevent the use of expired reagents.
3. Because there is no potable water at the wastewater plant, dirty laboratory glassware must be taken to the town shed (approximately one mile away) for cleaning. This is inefficient and makes it less likely glassware will be cleaned properly. Potable water, including hot water and if possible a bathroom, should be installed at the plant.
4. An alarm for chlorinator failure should be installed.

CORRECTIVE ACTIONS REQUIRED:

DES requests that Groveton describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, DES will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

DES requests that you submit your response to this inspection by **March 28, 2006**. If DES does not receive a signed, complete response within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Roy D. Gilbreth
NHDES/WD-WWEB
P.O. Box 95
Concord, NH 03302-0095

Enclosed is a copy of EPA Form 3560 – Water Compliance Inspection Report. Analytical results for samples taken on January 26, 2006 were hand-delivered during the inspection. Test results indicate all sample results are within acceptable range. If you have any questions concerning this inspection, please call Roy Gilbreth at 271-1494.

Sincerely,

 **COPY**

John R. Bush, P.E.
Administrator
Wastewater Engineering Bureau

cc: DES, WD, WWEB/File
Richard Marshall, Chief Operator, Northumberland WWTP
Roy D. Gilbreth, Environmental Inspector, WWEB
Margaret Bastien, P.E., WWEB
Gretchen Hamel, Enforcement Coordinator, DES
Joy Hilton, USEPA Water Technical Unit

Attachment: EPA Form 3560 – Water Compliance Inspection Report

CERTIFIED MAIL/RRR: 7099 3400 0003 6154 2591